

# **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

ELIZABETH SINES, et al., )  
)  
Plaintiffs, )  
) Civil Action No.  
vs. ) 3:17-cv-00072-NKM  
)  
JASON KESSLER, et al., )  
)  
Defendants. )  
\_\_\_\_\_ )

\* \* \* CONFIDENTIAL \* \* \*

REMOTE VIDEOTAPED DEPOSITION OF  
MICHAEL R. TUBBS  
Friday, June 19, 2020

STENOGRAPHICALLY REPORTED BY:  
RHONDA HALL-BREUWET, RDR, CRR, LCR, CCR, FPR  
JOB NO. 180543

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June 19, 2020

9:41 a.m.

Remote Videotaped Deposition of  
MICHAEL R. TUBBS, held before Rhonda  
Hall-Breuwet, Registered Diplomate Reporter,  
Certified Realtime Reporter, Licensed Court  
Reporter (TN), Certified Court Reporter (GA and  
LA), Florida Professional Reporter, and Notary  
Public of the State of Florida.

1 MICHAEL R. TUBBS

2 at your current employment?

3 A. Upon application.

4 Q. Now, are you a member of the League  
5 of the South?

6 A. I am.

7 Q. When did you become a member of the  
8 League of the South?

9 A. Approximately 2000.

10 Q. And how did you become a member of  
11 the League of the South?

12 A. I paid dues and submitted an  
13 application.

14 Q. Who introduced you to the League of  
15 the South?

16 A. I attended a rally in Montgomery,  
17 Alabama, in 2000 and met League members  
18 there.

19 Q. Did you meet a man by the name of  
20 Michael Hill at that time?

21 A. I saw Michael Hill speak, but I did  
22 not meet him personally.

23 Q. And when did you -- following that  
24 rally, when did you join League of the South?

25 A. Sometime shortly after I got home

1 MICHAEL R. TUBBS

2 from that rally.

3 Q. Did you -- why did you join League  
4 of the South?

5 A. I believe the organization  
6 represented best my views about the defense  
7 of the South land and her people.

8 Q. Did you take -- after the rally did  
9 you take any steps to learn anything else  
10 about League of the South other than what you  
11 learned at the rally?

12 A. Yes.

13 Q. What did you do?

14 A. I viewed their website.

15 Q. And did there come a time when you  
16 met Mr. Hill?

17 A. Yes.

18 Q. When?

19 A. I can't remember the first time I  
20 actually met Mr. Hill.

21 Q. Approximately when?

22 A. It would probably be a couple years  
23 after 2000.

24 Q. And did you get active in League of  
25 the South after you met him?